

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

RAYMOND HAWKINS, ROBIN LUNG,)
NEEDY KRISINA BAJAO-WIRTJES,)
RACHEAL LOVELL NEELY, SOMMER)
MOORE, ADAM DIPZINSKI, JONATHAN) CIVIL ACTION NO.: 1:19-cv-01062-JPH
WILSON, ISMAEL ATAYDE-)
GONZALES, CARLOS CANO, CAROLA)
SPURLOCK, LEIGHA AYRES, and)
ALVARO CRUZADO, individually and on)
behalf of all others similarly situated,)
Plaintiffs,)
v.)
CINTAS CORPORATION, BOARD OF)
DIRECTORS OF CINTAS)
CORPORATION, SCOTT D. FARMER,)
INVESTMENT POLICY COMMITTEE,)
and JOHN DOES 1-30.)
Defendants.)

**PLAINTIFFS' MOTION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES AND NAMED PLAINTIFFS
CASE CONTRIBUTION AWARDS**

Plaintiffs Raymond Hawkins, Robin Lung, Needy Krisina Bajao-Wirtjes, Rachael Lovell Neely, Sommer Moore, Adam Dipzinski, Jonathan Wilson, Ismael Atayde-Gonzales, Carlos Cano, Carola Spurlock, Leigha Ayres, and Alvaro Cruzado, (collectively "Plaintiffs"), participants in the Cintas Partners' Plan (the "Plan"), hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Granting class counsel attorneys' fees in the amount of amount of \$1,333,200.00, which represents approximately 33 1/3% of the settlement amount;
2. Directing reimbursement to Class Counsel in the amount of \$24,964.50 of

expenses incurred in the prosecution of the action;

3. Awarding a case contribution award of \$3,500 to each of the Plaintiffs (Raymond Hawkins, Robin Lung, Needy Krisina Bajao-Wirtjes, Rachael Lovell Neely, Sommer Moore, Adam Dipzinski, Jonathan Wilson, Ismael Atayde-Gonzales, Carlos Cano, Carola Spurlock, Leigha Ayres, and Alvaro Cruzado); and

4. For such other relief as the Court may deem just and proper.

A proposed form of Order is submitted hereto. The grounds for this Motion are set forth in the following documents filed contemporaneously herewith:

A. Memorandum of Law In Support of Plaintiffs' Motion for Award of Attorneys' Fees and Reimbursement of Expenses, and Case Contribution Awards to Plaintiffs;

B. Declaration of Mark K. Gyandoh In Support of Plaintiffs' Motion for Final Approval of Settlement and In Support of Motion for An Award of Attorneys' Fees, Reimbursement of Expenses and Case Contribution Awards for Plaintiffs;

C. Declarations of Plaintiffs Raymond Hawkins, Robin Lung, Needy Krisina Bajao-Wirtjes, Rachael Lovell Neely, Sommer Moore, Adam Dipzinski, Jonathan Wilson, Ismael Atayde-Gonzales, Carlos Cano, Carola Spurlock, Leigha Ayres, and Alvaro Cruzado In Support of Motion for Award of Attorneys' Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs.

Dated: June 3, 2024

Respectfully submitted,

CAPOZZI ADLER, P.C.

/s/ Mark K. Gyandoh

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*Attorneys for Plaintiffs, the Plan
and the Proposed Class*

CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2024, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

By: /s/ Mark K. Gyandoh
Mark K. Gyandoh, Esq.